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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

July 16, 2024

UNITED STATES OF AMERICA

V.

MARY BROWN (1);
Counts 1, 9, 17, 20, 24, 27, 29, 33

OSCAR WATTELL (2);
Counts 17, 21, 29, 36, 47

**THADDEUS MCDUELL (3);
Counts 1, 17, 24, 29**

SHELIBRA JONES (4);
Counts 1, 17, 19, 24, 26, 29, 32

**ANTHONY PERKINS (5);
Count 1**

**KIMBERLY PERKINS (6);
Counts 1, 2**

**MAGNOLIA UNDERWOOD (7);
Counts 1, 3**

PATRICE WILSON (8);
Counts 1, 4

**JARVIS SHERMAN (9);
Counts 1, 5**

**EUGUENE WALKER (10);
Counts 1, 6**

**DONTE WATSON (11);
Counts 1, 7**

**KAMISHILIA MATHIS (12);
Counts 1, 8**

**NICHOLAS YODER (13);
Count 9**

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Nathan Ochsner, Clerk of Court

Criminal No.:

UNDER SEAL

4:24-cr-371

**THEANE FOSTER (14);
Counts 9, 10**

CHRISTAL LOPEZ (15);
Counts 9, 11

**PAMELA YODER (16);
Counts 9, 12**

**DELEON BORDERS (17);
Counts 9, 13**

**KAMAIGA GHOLAR (18);
Counts 9, 14**

JEANINE VICTOR (19);
Counts 9, 15

**JAVEON FIELDS (20);
Counts 9, 16**

**CURTIS HOLLIDAY (21);
Count 17**

**XAVIER FRANCIS (22);
Count 17**

**JAMIE CRUISE (23);
Count 17**

**TIERRA CELESTINE (24);
Count 17**

**JC MOORE (25);
Count 17**

**LARYN HILL (26);
Counts 17, 18**

**DERRICK WASHINGTON (27);
Count 21**

**DRALANJALA JOHNSON (28);
Counts 21, 22**

**DESTYNEE WASHINGTON (29);
Counts 21, 23**

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**AMIR KHAN (46);
Counts 39, 40**

3. The process of assessing risk for a bail bond often requires documentation of collateral, generally by documenting financial assets and liquidity, to include ownership of real estate and yearly income by third parties who agree to enter the contract between the defendant and the bail bonds company as an additional indemnified party, thereby accepting the financial obligations of paying the full bail bond amount set by the Judge in the event of forfeiture. This additional indemnified party is commonly referred to as a “co-signer” and signs a promissory note, which is a financial debt instrument.

4. AABLE Bonds is a bail bonding company in Harris County, Texas, and the CEO of AABLE Bonds is SHEBA MUHARIB (53).

5. MUHARIB (53) is an agent of Financial Casualty & Surety (FCS). Financial Casualty & Surety maintains offices in 33 states and is engaged in interstate commerce.

6. Any review process or underwriting conducted by Financial Casualty & Surety would require the electronic transfer of documents obtained by AABLE Bail Bonds or its representatives. Documents related to each surety bond, which are a matter of court record, would also be submitted to the Government via electronic communication.

7. MARY BROWN (1), OSCAR WATTELL (2), and others operated as employees of AABLE Bail Bonds.

8. BROWN (1) and WATTELL (2) conspired with others to falsify and obtain falsified co-signer financial reports to qualify individuals, charged with criminal offenses, who would not otherwise qualify for the coverage necessary to meet the terms of their bond.

9. BROWN (1) and WATTELL (2) conspired with others to recruit straw co-signers who represented they worked at companies or earned incomes in the falsified co-signer financial reports when in fact they did not work at the companies or earn the represented incomes. It was

reasonably foreseeable that the falsified co-signer financial reports would be transmitted in interstate commerce wire communications as an attempt to show coverage necessary to meet the terms of the bonds.

10. The falsified co-signer financial reports were subsequently emailed or submitted via electronic communication, including but not limited to Bond-Pro, Inc, an electronic communications service/remote computing service provider located in Dahlonega, Georgia.

11. These fraudulent financial reports were relied upon by the Government and/or the insurance agency/agent to enter into a three-party agreement known as a surety bond.

BAIL BOND NO. 1: ANTHONY PERKINS

COUNT 1

CONSPIRACY TO COMMIT WIRE FRAUD

12. Beginning in or about January 2021 and continuing through in or about May 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

MARY BROWN (1)
THADDEUS MCDUELL (3)
SHELIBRA JONES (4)
ANTHONY PERKINS (5)
KIMBERLY PERKINS (6)
MAGNOLIA UNDERWOOD (7)
PATRICE WILSON (8)
JARVIS SHERMAN (9)
EUGENE WALKER (10)
DONTE WATSON (11)
KAMISHILIA MATHIS (12)

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of

the scheme, including causing a wire transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant Anthony Perkins (5), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNTS 2 THROUGH 8
WIRE FRAUD

13. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

14. Beginning in or about January 2021 and continuing through in or about May 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did knowingly devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond for Co-Defendant Anthony Perkins (5), who was detained at the Harris County Jail, as set forth below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
2	KIMBERLY PERKINS (6)	5/14/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia
3	MAGNOLIA UNDERWOOD (7)	5/14/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia

4	PATRICE WILSON (8)	5/14/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
5	JARVIS SHERMAN (9)	5/14/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
6	EUGENE WALKER (10)	5/14/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
7	DONTE WATSON (11)	5/14/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
8	KAMISHILIA MATHIS (12)	5/14/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

BAIL BOND NO. 2: NICHOLAS YODER

COUNT 9

CONSPIRACY TO COMMIT WIRE FRAUD

15. Beginning in or about September 2021 and continuing through in or about January 2022, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

MARY BROWN (1)
NICHOLAS YODER (13)
THEANE FOSTER (14)
CHRISTAL LOPEZ (15)
PAMELA YODER (16)
DELEON BORDERS (17)
KAMAIGA GHOLAR (18)
JEANINE VICTOR (19)
JAVEON FIELDS (20)

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and

for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant Nicholas Yoder (13), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNTS 10 THROUGH 16
WIRE FRAUD

16. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

17. Beginning in or about September 2021 and continuing through in or about January 2022, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did knowingly devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond for Co-

Defendant Nicholas Yoder (13), who was detained at the Harris County Jail, as set forth below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
10	THEANE FOSTER (14)	1/18/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia
11	CHRISTAL LOPEZ (15)	1/18/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia
12	PAMELA YODER (16)	1/18/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia
13	DELEON BORDERS (17)	1/18/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia
14	KAMAIGA GHOLAR (18)	1/18/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia
15	JEANINE VICTOR (19)	1/18/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia
16	JAVEON FIELDS (20)	1/18/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

BAIL BOND NO. 3: CURTIS HOLLIDAY

COUNT 17

CONSPIRACY TO COMMIT WIRE FRAUD

18. Beginning in or about May 2021 and continuing through in or about December 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

**MARY BROWN (1)
OSCAR WATTELL (2)
THADDEUS MCDUELL (3)
SHELIBRA JONES (4)
CURTIS HOLLIDAY (21)
XAVIER FRANCIS (22)
JAMIE CRUISE (23)
TIERRA CELESTINE (24)
JC MOORE (25)
LARYN HILL (26)**

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant Curtis Holliday (21), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNTS 18 THROUGH 20

WIRE FRAUD

19. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

20. Beginning in or about May 2021 and continuing through in or about December 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did knowingly devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing an electronic transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant Curtis Holliday (21), who was detained at the Harris County Jail, including the following items on or about the dates set forth in the Count below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
18	LARYN HILL (26)	11/15/2021	Falsified paystub submitted via text message
19	SHELIBRA JONES (4)	11/16/2021	Falsified paystubs submitted via electronic mail
20	MARY BROWN (1)	11/17/2021	Falsified paystubs submitted via electronic mail

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

BAIL BOND NO. 4: DERRICK WASHINGTON

COUNT 21

CONSPIRACY TO COMMIT WIRE FRAUD

21. Beginning in or about December 2021 and continuing through in or about January 2022, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

OSCAR WATTELL (2)
DERRICK WASHINGTON (27)
DRALANJALA JOHNSON (28)
DESTYNEE WASHINGTON (29)

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant Derrick Washington (27), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNTS 22 THROUGH 23

WIRE FRAUD

22. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

23. Beginning in or about December 2021 and continuing through in or about January 2022, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did knowingly devise and intend to devise a scheme and artifice to defraud by means of materially

false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond for Co-Defendant Derrick Washington (27), who was detained at the Harris County Jail, as set forth below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
22	DRANJALA JOHNSON (28)	1/19/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
23	DESTYNEE WASHINGTON (29)	1/19/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

BAIL BOND NO. 5: DESMAN TOLLIVER

COUNT 24

CONSPIRACY TO COMMIT WIRE FRAUD

24. Beginning in or about March 2021 and continuing through in or about July 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

MARY BROWN (1)
THADDEUS MCDUELL (3)
SHELIBRA JONES (4)
DESMAN TOLLIVER (30)
KIARA TOLLIVER (31)

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in

interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant Desman Tolliver (30), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNTS 25 THROUGH 26
WIRE FRAUD

25. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

26. Beginning in or about March 2021 and continuing through in or about July 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did knowingly devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond for Co-Defendant Desman Tolliver (30), who was detained at the Harris County Jail, as set forth below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
25	KIARA TOLLIVER (31)	7/12/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia
26	SHELIBRA JONES (4)	7/12/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

BAIL BOND NO. 6: MARQUALE GOSTON

COUNT 27

CONSPIRACY TO COMMIT WIRE FRAUD

27. Beginning in or about April 2021 and continuing through in or about February 2022, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

MARY BROWN (1)
MARQUALE GOSTON (32)
RONALD DEGRATE, JR. (33)

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant Marquale Goston (32), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNT 28

WIRE FRAUD

28. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

29. Beginning in or about April 2021 and continuing through in or about February 2022, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did

knowingly devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond for Co-Defendant Marquale Goston (32), who was detained at the Harris County Jail, as set forth below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
28	RONALD DEGRATE, JR. (33)	2/1/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

BAIL BOND NO. 7: PATRICK BROWN

COUNT 29

CONSPIRACY TO COMMIT WIRE FRAUD

30. Beginning in or about August 2021 and continuing through in or about January 2022, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

MARY BROWN (1)
OSCAR WATTELL (2)
THADDEUS MCDUELL (3)
SHELIBRA JONES (4)
PATRICK BROWN (34)
MICHAEL FORD, JR. (35)
CORNELIUS BROWN, JR. (36)

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and

for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant Patrick Brown (34), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNTS 30 THROUGH 32
WIRE FRAUD

31. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

32. Beginning in or about August 2021 and continuing through in or about January 2022, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did knowingly devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond for Co-Defendant Patrick Brown (34), who was detained at the Harris County Jail, as set forth below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
30	MICHAEL FORD, JR. (35)	1/25/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
31	CORNELIUS BROWN, JR. (36)	1/25/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
32	SHELIBRA JONES (4)	1/25/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

BAIL BOND NO. 8: GERALD WILLIAMS, JR.

COUNT 33

CONSPIRACY TO COMMIT WIRE FRAUD

33. Beginning in or about August 2021 and continuing through in or about October 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

MARY BROWN (1)
GERALD WILLIAMS, JR. (37)
ANTOINETTE GREEN (38)
DARRIS LEE (39)

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond,

in order to obtain a bail bond for Co-Defendant Gerald Williams, Jr. (37), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNTS 34 THROUGH 35
WIRE FRAUD

34. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

35. Beginning in or about August 2021 and continuing through in or about October 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did knowingly devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond for Co-Defendant Gerald Williams, Jr. (37), who was detained at the Harris County Jail, as set forth below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
34	ANTOINETTE GREEN (38)	10/27/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
35	DARRIS LEE (39)	10/27/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

BAIL BOND NO. 9: WALLACE THOMAS

COUNT 36
CONSPIRACY TO COMMIT WIRE FRAUD

36. Beginning in or about April 2022 and continuing through in or about May 2022, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

OSCAR WATTELL (2)
WALLACE THOMAS (40)
MEGHAN TILLIS (41)
AALIYAH THOMAS (42)
TAWANA JONES (43)
CHELSEA BATTLE (44)

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant Wallace Thomas (40), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNTS 37 THROUGH 38
WIRE FRAUD

37. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

38. Beginning in or about April 2022 and continuing through in or about May 2022, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did knowingly devise and intend to devise a scheme and artifice to defraud by means of materially

false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond for Co-Defendant Wallace Thomas (40), who was detained at the Harris County Jail, as set forth below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
37	MEGHAN TILLIS (41) AALIYAH THOMAS (42)	4/26/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia
38	MEGHAN TILLIS (41) CHELSEA BATTLE (44)	4/26/2022	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

BAIL BOND NO. 10: JAMES PALLADINA

COUNT 39

CONSPIRACY TO COMMIT WIRE FRAUD

39. Beginning in or about April 2021 and continuing through in or about June 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

**JAMES PALLADINA (45)
AMIR KHAN (46)
SCOTT WINGROVE (47)
JAMES BATESON (48)
CALVIN SKRIVANEK (49)
RASHAD DERRICK (50)**

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and

for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant James Palladina (45), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNTS 40 THROUGH 44
WIRE FRAUD

40. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

41. Beginning in or about April 2021 and continuing through in or about June 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did knowingly devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond for Co-Defendant James Palladina (45), who was detained at the Harris County Jail, as set forth below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
40	AMIR KHAN (46)	6/22/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
41	SCOTT WINGROVE (47)	6/22/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
42	JAMES BATESON (48)	6/22/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
43	CALVIN SKRIVANEK (49)	6/22/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia
44	RASHAD DERRICK (50)	6/22/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonga, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

BAIL BOND NO. 11: ROEMELLO BURROS

COUNT 45

CONSPIRACY TO COMMIT WIRE FRAUD

42. Beginning in or about September 2020 and continuing through in or about June 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants,

ROEMELLO BURROS (51)
KATHERINE O'BRIEN (52)

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted in

interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond, in order to obtain a bail bond for Co-Defendant Roemello Burros (51), who was detained at the Harris County Jail.

In violation of Title 18, United States Code, Sections 1349 and 1343.

COUNT 46
WIRE FRAUD

43. The Grand Jury incorporates by reference paragraphs 1 through 11 as though fully restated and re-alleged herein.

44. Beginning in or about September 2020 and continuing through in or about June 2021, in the Houston Division of the Southern District of Texas, and elsewhere, the defendants did knowingly devise and intend to devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme did transmit and cause to be transmitted in interstate commerce wire communications writings, signs, signals, and pictures in furtherance of the scheme, including causing a wire transmission of falsified documents in support of a bail bond for Co-Defendant Roemello Burros (51), who was detained at the Harris County Jail, as set forth below:

Count	Defendant(s)	Date (On or about)	Method of Wire Communication
46	KATHERINE O'BRIEN (52)	6/18/2021	Falsified paystub transmitted electronically to Bond Pro, Inc., located in Dahlonega, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2(a).

COUNT 47
CRIMES BY OR AFFECTING PERSONS ENGAGED IN THE BUSINESS OF
INSURANCE

45. The allegations set forth above in this Indictment are hereby adopted, realleged, and incorporated as if set out fully herein.

46. Beginning in or about November 2021 and continuing until in or about August 2022, in the Houston Division of the Southern District of Texas, and elsewhere,

OSCAR WATTELL (2)

defendant herein, knowing that he had been convicted of any criminal felony involving dishonesty, engaged in the business of insurance, whose activities affect interstate commerce, and willfully participated in such activity.

In violation of Title 18, United States Code, Sections 1033(e)(1)(A) and 2.

COUNT 48
CRIMES BY OR AFFECTING PERSONS ENGAGED IN THE BUSINESS OF
INSURANCE

47. The allegations set forth above in this Indictment are hereby adopted, realleged, and incorporated as if set out fully herein.

48. Beginning in or about November 2021 and continuing until in or about August 2022, in the Houston Division of the Southern District of Texas, and elsewhere,

SHEBA MUHARIB (53)

defendant herein, knowing that Co-Defendant Oscar Wattell (2) had been convicted of any criminal felony involving dishonesty, engaged in the business of insurance, whose activities affect interstate commerce, and willfully permitted such activity.

In violation of Title 18, United States Code, Sections 1033(e)(1)(B) and 2.

NOTICE OF FORFEITURE

49. Pursuant to Title 18, United States Code, Section 982 (a)(2)(A), the United States gives notice to the above-named defendants that in the event of conviction of the offenses charged in this Indictment, the United States intends to seek forfeiture of all property constituting or derived from proceeds obtained, directly or indirectly, as the result of such offenses.

Money Judgment and Substitute Assets

50. The United States gives notice that it will seek a money judgment against each defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants up to the value of the property subject to forfeiture.

A TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

ALAMDAR S. HAMDANI
United States Attorney, Southern District of Texas

By:

Michael E. Day
Michael E. Day
Assistant United States Attorney